

CORNERSTONE LAW FIRM, LLC

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Counsel for Non-Party Jason Jordan

In re	:	
National Brokers of America, Inc.,	:	No. 19-15488
Debtor.	:	Assigned to Judge Jean K. FitzSimon

**MOTION OF REAL PARTY IN INTEREST JASON SCOTT JORDAN TO LIFT STAY
OR, ALTERNATIVELY, FOR CONFIRMATION
OF ABSENCE OF AUTOMATIC STAY**

NOW COMES Jason Scott Jordan, a real party in interest, who hereby moves for an order to lift the automatic stay, or, alternatively, for confirmation of absence of automatic stay (i.e., a “comfort order”), pursuant to 11 U.S.C. §§ 105(a), 362; and offers the following:

On the grounds fully set forth in the accompanying Brief in Support, Mr. Jordan requests that the Court lift the automatic stay against Debtor “for cause” or, alternatively, enter a “comfort order,” confirming the absence of the automatic stay as applied to a non-party, Alan Christopher Redmond; in either case, so that trial can proceed as scheduled for the week of January 27, 2020 in National Brokers of America, Inc. and Alan Christopher Redmond v. Jason Scott Jordan, C.A. No. 14-17117 before the Berks County Court of Common Pleas.

WHEREFORE, based on the forgoing, Jason Scott Jordan respectfully request that the Court grant this Motion and enter the proposed order, lifting the automatic stay as to National Brokers of America, Inc. and Alan Christopher Redmond v. Jason Scott Jordan, C.A. No. 14-17117, before the Berks County Court of Common Pleas, or, alternatively, granting a “comfort order,” confirming the absence of the automatic stay as applied to Alan Christopher Redmond.

Respectfully submitted,

CORNERSTONE LAW FIRM, LLC

Dated: November 13, 2019

By:



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